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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

11	UNITED STATES OF AMERICA,)	CR No. 13
12	Plaintiff,)	<u>I N D I C T M E N T</u>
13	v.)	[31 U.S.C. §§ 5324(a)(3),
14	CINDY OMIDI,)	(d)(2): Structuring
15	aka "Nahid Omid,")	Transactions to Evade Reporting
16	aka "Nahid Pezeshk,")	Requirements; 18 U.S.C. § 2:
17	aka "Cindy Pezeshk,")	Aiding and Abetting and Causing
	Defendant.)	an Act to be Done; 31 U.S.C.
)	§ 5317(c): Criminal Forfeiture]

CR 13 00739

The Grand Jury Charges:

[31 U.S.C. § 5324(a)(3), (d)(2); 18 U.S.C. § 2]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The Bank Secrecy Act ("BSA") was a set of laws and regulations enacted to address an increase in criminal money laundering through financial institutions. In order to combat money laundering, the BSA required domestic financial institutions to file reports and maintain customer information for cash transactions that exceeded certain amounts.

1 2. The United States Postal Service ("USPS") was a
2 domestic financial institution under the BSA.

3 3. The BSA required the USPS and other financial
4 institutions to obtain information about any customer who
5 purchased \$3,000 or more in money orders using cash. The USPS
6 was required to maintain that information and report it to the
7 government upon request. The BSA also required the USPS and
8 other financial institutions to file a Currency Transaction
9 Report ("CTR") for any transaction involving more than \$10,000
10 in cash.

11 4. The USPS required its customers who used cash to
12 purchase \$3,000 or more in money orders to show proper
13 identification and fill out Postal Service Form 8105-A, also
14 called a Funds Transaction Report ("FTR".) FTRs recorded
15 information about the person who brought the cash to the Post
16 Office to purchase the money orders.

17 5. The USPS operated facilities at the following
18 locations, all within the Central District of California:

19 a. Wilshire Business Center Post Office, 10920
20 Wilshire Boulevard, Los Angeles, California 90024 ("Wilshire
21 Business Center");

22 b. Village Station Post Office, 11000 Wilshire
23 Boulevard, Los Angeles, California 90024 ("Village Station");

24 c. West LA Finance Center, 11420 Santa Monica
25 Boulevard, Los Angeles, California 90025 ("West LA Finance
26 Center"); and

27 d. Beverly Hills Main Post Office, 325 Maple Drive,
28 Beverly Hills, California 90210 ("Beverly Hills Main").

6. Defendant CINDY OMIDI, also known as ("aka") "Nahid Omid," aka "Nahid Pezeshk," aka "Cindy Pezeshk" ("defendant C. OMIDI"), resided in Los Angeles County, California, within the Central District of California, and maintained a Post Office Box at Village Station.

B. DEFENDANT C. OMIDI'S STRUCTURING

7. Between in or about July 2008 through in or about December 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant C. OMIDI, together with others known and unknown to the Grand Jury, knowingly and for the purpose of evading the reporting requirements of Sections 5313(a) and 5325 of Title 31, United States Code, and the regulations promulgated thereunder, structured, assisted in structuring, attempted to structure and assist in structuring, and aided and abetted in structuring and caused to be structured, the following transactions, among others, with a domestic financial institution, namely, the USPS, as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

Date	Subtotal	Money Order Amount	Money Order Serial #	Post Office
8/14/08	\$900	\$900	12656224113	Village Station
	\$2,900	\$1,000	93648743548	Wilshire Business Center
		\$1,000	93648743550	
		\$900	93648743561	
8/25/08	\$1,000	\$1,000	12656222886	Village Station
	\$2,900	\$1,000	93648745484	Wilshire Business Center
		\$1,000	93648745495	
		\$900	93648745506	
9/16/08	\$900	\$900	12656228207	Village Station
	\$2,900	\$1,000	93648748151	Wilshire Business Center
		\$1,000	93648748162	
		\$900	93648748173	

Date	Subtotal	Money Order Amount	Money Order Serial #	Post Office
9/24/08	\$2,900	\$1,000	12332452476	Beverly Hills Main
		\$1,000	12332452487	
		\$900	12332452498	
	\$2,900	\$1,000	12656794781	West LA Finance Station
		\$1,000	12656794792	
		\$900	12656794803	
9/27/08	\$2,900	\$1,000	12655758936	Beverly Hills Main
		\$1,000	12655758947	
		\$900	12655758958	
	\$2,900	\$1,000	13013233200	West LA Finance Station
		\$1,000	13013233211	
		\$900	13013233222	
10/15/08	\$2,900	\$1,000	13013240534	West LA Finance Center
		\$1,000	13013240545	
		\$900	13013240556	
	\$2,900	\$1,000	93648815807	Wilshire Business Center
		\$1,000	93648815818	
		\$900	93648815820	
	\$900	\$900	12656229704	Village Station
10/17/08	\$2,900	\$1,000	12655770592	Beverly Hills Main
		\$1,000	12655770603	
		\$900	12655770614	
10/20/08	\$2,900	\$1,000	12655766643	Beverly Hills Main
		\$1,000	12655766654	
		\$900	12655766665	
	\$2,900	\$1,000	13013248140	West LA Finance Center
		\$1,000	13013248151	
		\$900	13013248162	
10/22/08	\$2,900	\$1,000	09102144690	Beverly Hills Main
		\$1,000	09102144701	
		\$900	09102144712	
	\$2,900	\$1,000	93648817945	Wilshire Business Center
		\$1,000	93648817956	
		\$900	93648817967	
10/29/08	\$2,900	\$1,000	93648818733	Wilshire Business Center
		\$1,000	93648818744	
		\$900	93648818755	
10/30/08	\$2,900	\$1,000	93648818867	Wilshire Business Center
		\$1,000	93648818878	
		\$900	93648818902	

Date	Subtotal	Money Order Amount	Money Order Serial #	Post Office
10/31/08	\$2,900	\$1,000	16366202594	Beverly Hills Main
		\$1,000	16366202605	
		\$900	16366202616	
11/5/08	\$2,900	\$1,000	93552311237	Wilshire Business Center
		\$1,000	93552311248	
		\$900	93552311250	
11/6/08	\$2,900	\$1,000	16366202752	Beverly Hills Main
		\$1,000	16366202763	
		\$900	16366202774	
11/12/08	\$2,900	\$1,000	16366183007	Beverly Hills Main
		\$1,000	16366183018	
		\$900	16366183020	
11/18/08	\$2,900	\$1,000	93552311981	Wilshire Business Center
		\$1,000	93552311992	
		\$900	93552312003	
11/18/08	\$2,900	\$1,000	93552313048	Wilshire Business Center
		\$1,000	93552313050	
		\$900	93552313061	
11/19/08	\$2,900	\$1,000	16366189048	Beverly Hills Main
		\$1,000	16366189050	
		\$900	16366189061	
12/9/08	\$2,900	\$1,000	16366185145	Beverly Hills Main
		\$1,000	16366185156	
		\$900	16366185167	
12/10/08	\$2,900	\$1,000	93552316391	Wilshire Business Center
		\$1,000	93552316402	
		\$900	93552316413	
10/15/09	\$2,900	\$1,000	50239891888	Wilshire Business Center
		\$1,000	50239891890	
		\$900	50239891901	
10/16/09	\$1,900	\$1,000	50239891991	Wilshire Business Center
		\$900	50239892013	
11/24/09	\$2,900	\$1,000	50239896480	Wilshire Business Center
		\$1,000	50239896491	
		\$900	50239896502	
11/25/09	\$2,900	\$1,000	50239896625	Wilshire Business Center
		\$1,000	50239896636	
		\$900	50239896647	

FORFEITURE ALLEGATION

[31 U.S.C. § 5317(c)]

8. The Grand Jury incorporates and realleges paragraphs One through Seven of this Indictment above as though fully set forth in their entirety herein for the purpose of alleging forfeiture pursuant to the provisions of Title 31, United States Code, Section 5317(c).

9. Defendant C. OMIDI, if convicted of the offense charged in this Indictment, shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property involved in the offense committed in violation of Title 31, United States Code, Section 5324(a)(3), and all property traceable to such property, including the following:

(1) all money or other property that was the subject of each transaction conducted in violation of Title 31, United States Code, Section 5324(a)(3);

(2) all property traceable to money or property described in this paragraph 2.a.(1).

b. A sum of money equal to the total amount of money involved in the offense committed in violation of Title 31, United States Code, Section 5324(a)(3).

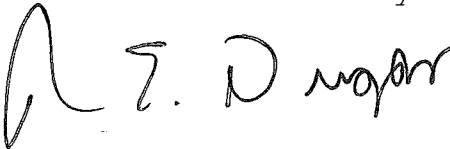
10. If, as a result of any act or omission by defendant C. OMIDI, any of the foregoing money or property (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been

1 commingled with other property that cannot be subdivided without
2 difficulty, then any other property or interests of defendant C.
3 OMIDI, up to the value of the money and property described in
4 the preceding paragraph of this Indictment, shall be subject to
5 forfeiture to the United States.

6 A TRUE BILL

7 15/
8 Foreperson

9 ANDRÉ BIROTTE JR.
10 United States Attorney

11 
12

13 ROBERT E. DUGDALE
14 Assistant United States Attorney
Chief, Criminal Division

15 RICHARD E. ROBINSON
16 Assistant United States Attorney
Chief, Major Frauds Section

17 CONSUELO S. WOODHEAD
18 Assistant United States Attorney
Deputy Chief, Major Frauds Section

19 AARON M. MAY
20 Assistant United States Attorney
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21 DAVID L. KIRMAN
22 Assistant United States Attorney
23 Major Frauds Section